Exhibit A

CEASE AND DESIST LETTERS

Gmail

N. Wahid Azal <wahidazal66@gmail.com>

Cease & Desist (Without Prejudice)

1 message

N.W. Azal <wahidazal66@gmail.com> Tue, Jan 13, 2026 at 8:15 PM
To: Daniel Deitrick <daniel.deitrick@me.com>, DC Shepard <officialdcshepard@gmail.com>
Cc: Uniting The Cults <contact@unitingthecults.com>

13 January 2026

Dear Daniel Deitrick/DC Sheperd:

Since you are on record claiming to no longer speak about me as of Saturday, 10 January 2026, I am writing to place you on **formal notice** regarding a pattern of public statements and conduct by you up to that date that are false, defamatory, and harmful to my reputation and professional activities.

Specifically, you have published statements on the **r/exbahai** subreddit <such as this one, here: https://www.reddit.com/r/exbahai/comments/1q7rydp/comment/nyjnd3h/?force-legacy-sct=1> alleging abusive conduct, psychological instability, and other wrongdoing as factual claims, while simultaneously declaring an intent to pursue coordinated efforts to have me deplatformed and professionally silenced. These statements are unsupported by verifiable evidence and exceed the bounds of protected opinion.

I further note your public assertions of **intent to interfere** with my access to platforms, audiences, and professional opportunities. Such conduct may constitute **defamation**, **harassment**, and **tortious interference** under applicable U.S. law.

I hereby demand that you immediately **cease and desist** from:

1. Publishing or repeating false statements of fact about me;
2. Representing unverified allegations as established misconduct;
3. Encouraging or coordinating third parties to suppress my lawful speech or professional activities.

I also strongly advise that from here on out you consult a qualified attorney over any statement you publicly make about me, and that you also show them this present letter.

This notice is provided without waiver of any rights or remedies, all of which are expressly reserved.

Sincerely,
Wahid Azal

Gmail

N. Wahid Azal <wahidazal66@gmail.com>

Second Cease & Desist (Without Prejudice) – YouTube Podcast and Substack Publication

1 message

N.W. Azal <wahidazal66@gmail.com> Mon, Jan 19, 2026 at 11:28 AM
To: Daniel Deitrick <daniel.deitrick@me.com>, DC Shepard <officialdcshepard@gmail.com>
Cc: Uniting The Cults <contact@unitingthecults.com>

19 January 2026

Dear Daniel Deitrick/DC Shepard,

This correspondence constitutes a **second Cease & Desist notice**, issued **without prejudice** and **for record-keeping purposes**, following my prior notice dated 13 January 2026.

Despite having been placed on formal notice regarding false and defamatory statements previously made about me, you have since **republished and amplified substantially similar allegations** through **(a)** a podcast episode publicly circulated under *The Hidden Faith* project, and **(b)** a subsequent Substack post summarizing, endorsing, and expanding upon those allegations.

These more recent publications include, without limitation, assertions and insinuations presented as fact that I am a "cult leader," that I am antisemitic, that I suffer from psychological delusions or instability, that I engage in abusive conduct, and that I have been involved in or associated with criminal or quasi-criminal behavior. These claims are **false**, **unsupported by verifiable evidence**, and **harmful to my reputation and professional activities**. They exceed the bounds of protected opinion and constitute defamatory statements of fact and reckless implication.

Of particular concern is the continued use of **psychiatric labeling and criminal insinuation** as a substitute for evidence, as well as the repetition of these claims after prior notice. Continued publication under these circumstances may support findings of **actual malice**, **harassment**, and **tortious interference**, depending on jurisdiction.

For the avoidance of doubt, this second notice does not supersede or replace my earlier correspondence. It **supplements the record** and documents that you are now on notice regarding the podcast episode and the most recent Substack publication as additional instances of the same unlawful pattern of conduct.

I hereby again demand that you immediately **cease and desist** from:

1. Publishing, republishing, or amplifying false statements of fact about me;
2. Presenting unverified allegations, insinuations, or character attributions as established misconduct;
3. Repeating defamatory psychiatric or criminal implications in any medium;
4. Encouraging, coordinating, or soliciting third parties to deplatform, harass, or professionally interfere with me on the basis of false allegations.

For purposes of accuracy and preservation, I further note that a **complete archive of relevant private Reddit communications between us**, documenting prior collaboration and the subsequent reversal of narrative, has been uploaded to **archive.org**, here. This archive exists to ensure an objective and immutable record and may be relied upon in any platform review or legal proceeding.

Nothing in this letter constitutes a waiver of any rights, claims, or remedies, all of which are expressly reserved. This notice is provided to afford you an opportunity to correct course and mitigate further harm.

You are again strongly advised to consult qualified legal counsel regarding any future public statements concerning me and to provide counsel with copies of both this notice and my prior correspondence.

Sincerely,

Wahid Azal

On Tue, Jan 13, 2026 at 8:15 PM N.W. Azal <wahidazal66@gmail.com> wrote:

13 January 2026

Dear Daniel Deitrick/DC Sheperd:

Since you are on record claiming to no longer speak about me as of Saturday, 10 January 2026, I am writing to place you on **formal notice** regarding a pattern of public statements and conduct by you up to that date that are false, defamatory, and harmful to my reputation and professional activities.

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I also strongly advise that from here on out you consult a qualified attorney over any statement you publicly make about me, and that you also show them this present letter.

This notice is provided without waiver of any rights or remedies, all of which are expressly reserved.

Sincerely,
Wahid Azal

Gmail

N. Wahid Azal <wahidazal66@gmail.com>

Third Cease & Desist Notice – Unauthorized Use of Copyrighted Image, False Statements, and Continuing Harassment

1 message

N.W. Azal <wahidazal66@gmail.com> Wed, Jan 28, 2026 at 6:43 PM
To: Daniel Deitrick <daniel.deitrick@me.com>
Cc: DC Shepard <officialdcshepard@gmail.com>

WITHOUT PREJUDICE – NOTICE TO CEASE AND DESIST

To:
Daniel Deitrick (a/k/a "DC Shepard")
1501 Harry Thomas Way NE, Apartment 604
Washington, DC 20002
United States
Telephone: (914) 330-3976
Email: daniel.deitrick@me.com

officialdcshepard@gmail.com

From:
Wahid Azal
Ashgrove, Queensland
Australia

Date: 28 January 2026

Dear Mr. Deitrick,

This letter constitutes a **third formal notice** requiring you to **cease and desist** from specified unlawful conduct. It is written without prejudice to any rights or remedies available to me at law or in equity.

1. Background and YouTube Counter-Notification

On 28 January 2026, YouTube notified me that you submitted a **DMCA counter-notification** relating to the removal of a video located at:
http://www.youtube.com/watch?v=Agxbucr0ADE

In that counter-notification, you asserted, *under penalty of perjury*, among other things, that:

"I designed the thumbnail entirely from a publicly available image online for the purposes of criticism or commentary, which is fair use under the Copyright Act of 1976 as amended under DMCA 1998."

You further alleged that my copyright complaint constituted an attempt "to suppress [your] free speech," and you made multiple accusations concerning my character and conduct.

These statements are now part of a formal legal record generated by you voluntarily and sworn under penalty of perjury.

2. Copyright Infringement – Unauthorized Use of Photograph

The photographic image used by you as a thumbnail is an original photograph authored by me. Copyright protection attaches automatically upon creation under **17 U.S.C. §102(a)**. I am the sole copyright owner.

Your use of the image as a **thumbnail / visual identifier** is not protected by fair use. Courts have consistently held that use of a photograph merely to depict or identify a person—rather than to comment on the photograph itself—is **non-transformative** and weighs against fair use. See, inter alia:

- *BWP Media USA v. Gossip Cop Media*, 87 F. Supp. 3d 499 (S.D.N.Y. 2015)
- *Barcroft Media, Ltd. v. Coed Media Group*, 297 F. Supp. 3d 339 (S.D.N.Y. 2017)
- *Monge v. Maya Magazines*, 688 F.3d 1164 (9th Cir. 2012)

Your assertion that the image was "publicly available" is legally irrelevant; public availability does not negate copyright ownership.

3. False and Defamatory Statements

Your counter-notification further contains statements accusing me of criminal conduct, harassment, and threats of violence, including assertions that I engaged in "doxxing," "criminal action," and violent threats. These statements are **false**, unsupported, and published in a context intended to harm my reputation.

Under U.S. law, knowingly or recklessly publishing false statements of fact that harm another's reputation may constitute **defamation *per se***, **false light**, and **intentional interference with lawful rights**, depending on jurisdiction.

Nothing in the First Amendment protects false statements of fact or misuse of copyrighted material.

4. Demand

Accordingly, I hereby demand that you:

1. **Immediately cease and desist** from any further use, reproduction, or display of my copyrighted photograph in thumbnails, videos, or promotional materials;
2. **Refrain from publishing or republishing false statements of fact** alleging criminal conduct, threats of violence, or harassment by me;
3. **Cease further targeted use of my identity or image** in a manner intended to harass, intimidate, or misrepresent.

5. Reservation of Rights

Nothing in this letter constitutes a waiver of any rights or remedies. I expressly reserve all rights, including the right to pursue civil remedies in appropriate jurisdictions should the conduct described above continue.

This letter is sent in good faith in an effort to resolve this matter without further escalation.

Sincerely,

Wahid Azal